

SEMENTZA KIRCHER RICKARD
10161 Park Run Dr., Ste. 150
Las Vegas, Nevada 89145
Telephone: (702) 835-6803

1 LAWRENCE J. SEMENZA, III, Esq., Bar No. 7174
Email: ljs@skrlawyers.com
2 CHRISTOPHER D. KIRCHER, Esq., Bar No. 11176
Email: cdk@skrlawyers.com
3 JARROD L. RICKARD, Esq., Bar No. 10203
Email: jlr@skrlawyers.com
4 SEMENZA KIRCHER RICKARD
10161 Park Run Drive, Suite 150
5 Las Vegas, Nevada 89145
6 Telephone: (702) 835-6803
7 Facsimile: (702) 920-8669

8 Adam Petitt, Esq. (*admitted Pro Hac Vice*)
STRADLEY RONON STEVENS & YOUNG, LLP
9 2005 Market Street, Suite 2600
Philadelphia, PA 19103-7018
10 Telephone: (215) 564-8130
11 Facsimile: (215) 564-8120

12 Attorneys for *Charles M. Hallinan*
and *Hallinan Capital Corp.*

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15 UNITED STATES DISTRICT COURT
16 DISTRICT OF NEVADA

17 THOMAS W. McNAMARA, as the Court-
Appointed Monitor for AMG Capital
Management, LLC; BA Services LLC; Black
Creek Capital Corporation; Broadmoor Capital
Partners, LLC; Park 269, LLC; C5 Capital
LLC; DF Services Corp.; DFTW Consolidated
[UC] LLC; Impact BP LLC; Level 5 Apparel
LLC; Level 5 Capital Partners LLC; Level 5
Eyewear LLC; Level 5 Motorsports, LLC;
Level 5 Scientific LLC; NM Service Corp.
(f/k/a/ National Money Service); PSB Services
LLC; Real Estate Capital LLC (f/k/a/ Rehab
Capital I, LLC); Sentient Technologies; ST
Capital LLC; Westfund LLC; Eclipse
Renewables Holdings LLC; Scott Tucker
Declaration of Trust, dated February 20, 2015;
West Race Cars, LLC; and Level 5
Management LLC; and their successors,
assigns, affiliates, and subsidiaries,

27 Plaintiff,
v.
28 CHARLES M. HALLINAN, an individual;

GMN
Case No. 2:17-cv-02966-KJD-NJK

DEFENDANTS' UNOPPOSED
MOTION TO CONTINUE DEADLINE
TO RESPOND TO MONITOR'S
MOTION TO COMPEL DISCOVERY
FROM DEFENDANT HALLINAN
CAPITAL CORP. (ECF NO. 68)

(FIRST REQUEST)

1 HALLINAN CAPITAL CORP., a Delaware
2 corporation; DOES I-X; and ROE
3 CORPORATIONS I-X,

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5 Defendants.

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10 Defendants Charles M. Hallinan and Hallinan Capital Corp. ("Defendants") hereby
11 request a brief extension, until February 1, 2018, to file their Response to Plaintiff Court-
12 Appointed Monitor Thomas W. McNamara's ("Plaintiff") Motion Compel Discovery from
13 Defendant Hallinan Capital Corp. (ECF No. 68). Currently, Defendants' Response is due January
14 28, 2019.

15 Defendants' counsel has the current conflicts, among others, that necessitate a brief
16 extension of the Response deadline: (1) Defendants' lead counsel has a deadline in another matter
17 which requires counsel's immediate attention on January 25, 2019; (2) Due to childcare
18 obligations on January 26-27, 2019; (3) Defendants' lead counsel is precluded from working on
19 Defendants' Response during this time; (4) On January 30, 2019, counsel for Plaintiff and
20 Defendants will both be attending the scheduled deposition of Linda Hallinan and Defendants'
21 lead counsel will be unable to work on Defendants' Response; (5) Defendants' lead counsel is
22 scheduled to be in Baltimore, MD for an appellate oral hearing before the Circuit Court for
23 Montgomery County, Maryland, on Thursday January 31, 2019, and New York, NY for a motion
24 hearing before the Supreme Court of New York, Bronx County, on February 1, 2019.
25 Defendants' lead counsel's preparation for the aforementioned hearings is required in the
26 preceding days.

27 In anticipation of filing this Motion, Defendants' counsel reached out to Plaintiff's counsel.
28 Plaintiff's counsel confirmed that Plaintiff does not oppose an extension until Wednesday,
January 30, 2019, and takes no position with respect to moving the deadline to February 1, 2019.

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Based upon the foregoing stated conflicts with Defendants' lead counsel's schedule and no open objection by Plaintiff, Defendants submit that good cause exists to move the Response deadline to February 1, 2019.

DATED this 25th day of January, 2019.

SEMENTZA KIRCHER RICKARD

/s/ *Jarrod L. Rickard*

Lawrence J. Semenza, III, Esq., Bar No. 7174
Christopher D. Kircher, Esq., Bar No. 11176
Jarrod L. Rickard, Esq., Bar No. 10203
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145

*Attorneys for Defendants,
Charles M. Hallinan and Hallinan Capital Corp.*

IT IS SO ORDERED.
Dated: January 28, 2019

Nancy J. Koppe
United States Magistrate Judge